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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER
MAY 31 2019
DAVID H. YAMASAKI, Clerk of the Court
SAUNDRA GILBERT
DEPUTY

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

DIVINA VILLACARLOS CATALASAN
(6/26/1958),

Defendant.

Case No.:
AG Docket No. OR2016102139

FELONY COMPLAINT

- Ct 1: Insurance Fraud, PC §550(a)(6)
- Ct 2: Insurance Fraud, PC §550(a)(6)
- Ct 3: Insurance Fraud, PC §550(a)(6)
- Ct 4: Grand Theft, PC §487(a)
- Ct 5: Grand Theft, PC §487(a)
- Ct 6: Grand Theft, PC §487(a)

SPECIAL ALLEGATIONS
Presumption Probation Ineligible, PC §1203.045
White Collar Loss>\$100,000, PC § 186.11(a)(3)
White Collar Loss>\$500,000, PC §186.11(a)(2)

INFORMATION

Date: _____

1 The undersigned, certifying upon information and belief, complains that defendant
2 DIVINA VILLACARLOS CATALASAN did commit the following crimes in Orange County,

3 State of California:

4 **COUNT 1**

5 **Insurance Fraud – Penal Code §550(a)(6)**

6 Beginning on or after January 1, 2013, and continuing on through at least May 31, 2015,
7 defendant DIVINA VILLACARLOS CATALASAN knowingly made or caused to be made a
8 false or fraudulent claim for payment of a health care benefit from the Medi-Cal program, in
9 violation of Penal Code §550(a)(6), a felony.

10 **COUNT 2**

11 **Insurance Fraud – Penal Code §550(a)(6)**

12 Beginning on or after January 1, 2013, and continuing on through at least May 31, 2015,
13 defendant DIVINA VILLACARLOS CATALASAN knowingly made or caused to be made a
14 false or fraudulent claim for payment of a health care benefit from the Medicare program, in
15 violation of Penal Code §550(a)(6), a felony.

17 **COUNT 3**

18 **Insurance Fraud – Penal Code §550(a)(6)**

19 Beginning on or after January 1, 2013, and continuing on through at least May 31, 2015,
20 defendant DIVINA VILLACARLOS CATALASAN knowingly made or caused to be made a
21 false or fraudulent claim for payment of a health care benefit from CalOptima, in violation of
22 Penal Code §550(a)(6), a felony.

24 **COUNT 4**

25 **Grand Theft – Penal Code §487(a)**

26 Beginning on or about January 1, 2013, and continuing on through at least May 31, 2015,
27 defendant DIVINA VILLACARLOS CATALASAN did willfully and unlawfully take from the
28 State of California, money in excess of \$950.00, in violation of Penal Code §487(a), a felony.

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COUNT 5

Grand Theft – Penal Code §487(a)

Beginning on or about January 1, 2013, and continuing on through at least May 31, 2015, defendant DIVINA VILLACARLOS CATALASAN did willfully and unlawfully take from the United States of America., money in excess of \$950.00, in violation of Penal Code §487(a), a felony.

COUNT 6

Grand Theft – Penal Code §487(a)

Beginning on or about January 1, 2013, and continuing on through at least May 31, 2015, defendant DIVINA VILLACARLOS CATALASAN did willfully and unlawfully take from CalOptima, money in excess of \$950.00, in violation of Penal Code §487(a), a felony.

SPECIAL ALLEGATIONS

Aggravated White Collar Crime Enhancement – Penal Code §186.11(a)(3)

It is further alleged that the crimes defendant DIVINA VILLACARLOS CATALASAN is charged with in Counts 1 through 6 above are related felonies, a material element of which is fraud, and that the resulting loss exceeded more than \$100,000.00 within the meaning of Penal Code §186.11(a)(3)

Aggravated White Collar Crime Enhancement – Penal Code §186.11(a)(2)

It is further alleged that the crimes defendant DIVINA VILLACARLOS CATALASAN is charged with in Counts 1 through 6 above are related felonies, a material element of which is fraud, and that the resulting loss exceeded more than \$500,000.00 within the meaning of Penal Code §186.11(a)(a)

Probation Limitation – Penal Code §1203.045

It is further alleged that in the commission of Counts 1 through 6 charged above, that defendant DIVINA VILLACARLOS CATALASAN, with the intent to do so, unlawfully took in excess of \$100,000.00, within the meaning of the Penal Code §1203.045, thereby requiring defendant be denied probation.

Statute of Limitations/ Late Discovery Exception (*People v. Zamora* Allegation)

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DECLARATION

I declare under penalty of perjury based on information and belief that the foregoing is true and correct. Executed on the 30th day of May, 2019, in San Diego, California.

For XAVIER BECERRA, Attorney General



RYAN E. SCOTT,
Deputy Attorney General
Attorneys for the People of the State of California
Declarant

Time estimate for preliminary examination: 1 day

INFORMATION

Dated: _____ For XAVIER BECERRA, Attorney General

RYAN E. SCOTT,
Deputy Attorney General
Attorneys for the People of the State of California

**PURSUANT TO PENAL CODE §1054.5(b), THE PEOPLE ARE HEREBY
INFORMALLY REQUESTING THAT DEFENDANT'S COUNSEL PROVIDE
DISCOVERY TO THE PEOPLE AS REQUIRED BY PENAL CODE §1054.3.**